## IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF INDIANA INDIANAPOLIS DIVISION

STAVANGER HOLDINGS, LTD and KARL ANDERSEN,	)
Plaintiffs,	)
V.	) CASE NO. 1:12-cv-0646 WTL-DKL
TRANEN CAPITAL, LTD., TRANEN CAPITAL ALTERNATIVE INVESTMENT FUND, LTD., THE LEO GROUP, LLC, KENNETH A. LANDGAARD, AND ARTHUR L. BOWEN,	) ) ) ) ) ) )
Defendants.	)

## **MOTION FOR PROTECTIVE ORDER**

Defendants Tranen Capital, Ltd., Tranen Capital Alternative Investment Fund, Ltd., Kenneth A. Landgaard, and Arthur L. Bowen, by counsel, pursuant to F.R.Civ.P. Rule 26 (c), hereby move the Court for an order that their depositions not go forward on September 16 and 17 as noticed by Plaintiffs and not be taken until after such time as the pending motion for judgment on the pleadings and motion to compel discovery have been ruled upon. The grounds for this motion are that resolution of the pending motions will clarify the issues for discovery and protect the defendants from multiple depositions, and because plaintiffs failed to comply with S.D. Ind. L.R. 30-1(d) by scheduling the depositions on less than 14 days notice without leave of court or agreement of counsel.

Counsel for Tranen and Evangelos Michailidis, one of the attorneys representing Plaintiffs, made a good-faith effort to informally resolve the deposition postponement issue on September 10, 2013, but were unable to reach agreement.

The grounds for the motion are set forth more fully in the accompanying supporting memorandum.

## FROST BROWN TODD LLC

By: s/ Thomas E. Satrom

Thomas E. Satrom, #20745-49

Attorneys for Defendants Kenneth A. Landgaard, Arthur L. Bowen, Tranen Capital, Ltd., and Tranen Alternative Investment Fund, Ltd.

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 12th day of September, 2013, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Ryan M. Hurley FAEGRE BAKER DANIELS LLP 300 North Meridian Street, Suite 2700 Indianapolis, IN 46204 ryan.hurley@FaegreBD.com

Mauro M. Wolfe Evangelos Michaildis DUANE MORRIS LLP 1540 Broadway New York, NY 10036-4086 mmwolfe@duanemorris.com emichailidis@duanemorris.com T. Joseph Wendt BARNES & THORNBURG LLP 11 South Meridian Street Indianapolis, IN 46204 jwendt@btlaw.com

s/ Thomas E. Satrom

FROST BROWN TODD LLC 201 North Illinois Street, Suite 1900 P.O. Box 44961 Indianapolis, IN 46244-0961 317-237-3800

Fax: 317-237-3900 *tsatrom@fbtlaw.com* 

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